

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

iRACING.COM MOTORSPORT SIMULATIONS LLC,)
a Delaware Limited Liability Company, Plaintiff)
)
V.) Civil Action No.
) 05-11639 NG
)
TIM ROBINSON, individually and d/b/a)
www.ow-racing.com and www.torn8alley.com,)
Defendant)

MOTION TO EXTEND TIME WITHIN WHICH
DEFENDANT MAY SUBMIT ADDITIONAL BRIEFS ON
PLAINTIFF'S MOTION TO COMPEL DISCOVERY
AND DEFENDANT'S MOTION TO DISMISS

The undersigned counsel moves that the time within which the defendant may submit additional briefs be extended to and including Friday, March 10, 2006.

In support of this motion the undersigned counsel respectfully submits that the disposition of these motions may have serious consequences to defendant, and the additional time is reasonably required to complete analysis of the issues raised by these motions and to confer with the out-of-state client, who recently has been unavailable.

The undersigned counsel sent email requests this morning to plaintiff's counsel of record, Attorney Irwin B. Schwartz and Attorney Michael G. Andrews requesting plaintiff's assent to an extension to and including March 10, 2006. Both attorneys acknowledged receiving these emails at 10:51 a.m., but no assent has been forthcoming.

WHEREFORE the undersigned counsel respectfully requests of the Court that the time

within which defendant may file a supplemental submission be extended to and including Friday, March 10, 2006.

By his attorneys,

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Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent by U.S. Mail to any indicated as non registered participants on this date.

March 2,2006

Joseph F. Ryan BBO# 435720